

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Application of Pacific Gas and Electric Company  
To Revise Its Electric Marginal Costs, Revenue  
Allocation, and Rate Design. (U 39 M)

Application 06-03-005  
(Filed March 2, 2006)

**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 E)  
COMMENTS ON THE NOVEMBER 2007 WORKSHOP DESCRIBED  
IN THE AUGUST 22, 2007 SUPPLEMENTAL SCOPING MEMO AND  
ASSIGNED COMMISSIONER'S RULING UPDATING ISSUES  
LIST, SCHEDULE, AND CATEGORIZATION**

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December 11, 2007

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LIST, SCHEDULE, AND CATEGORIZATION**

Pursuant to Commissioner Chong's August 22, 2007 *Supplemental Scoping Memo and Assigned Commissioner's Ruling updating Issues List, Schedule and Categorization* (Scoping Memo), and the subsequent filing extension recently granted, San Diego Gas and Electric Company (SDG&E) submits the following Comments on the November 2007 Workshop. As discussed at the Workshop, in making these Comments SDG&E understands that the ultimate goal of this phase of the proceeding is to develop a strategic work plan that will direct Pacific Gas and Electric Company (PG&E) in the development and implementation of dynamic pricing tariffs for all customers by 2011.<sup>1</sup>

**I. Objective of Rate Design**

SDG&E agrees with the preliminary conclusions presented at the Workshop. While the conclusions stated dynamic pricing rates should reflect long-term marginal costs, dynamic rates are likely to reflect both short term and long term marginal costs depending on the source of the information. For example, to the extent the energy rates are linked to the wholesale market under a real-time pricing (RTP) tariff, the rates would generally reflect short term costs. That is, the energy costs would most likely not include

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<sup>1</sup> SDG&E understands that the resulting strategic plan would also provide guidance for the development and implementation of dynamic pricing tariffs for the other utilities.

a capacity cost element, which would be reflected in a long term marginal cost. Thus, the Commission should ensure that any marginal costs developed and used in the implementation of dynamic pricing reflect both short term and long term marginal costs.

Overall, basing dynamic rates on marginal costs should provide customers with price signals that more accurately reflect the cost of power (energy and capacity) and should allow customers to make more informed economic decisions with respect to their energy usage. However, the Commission should ensure that dynamic rates are designed on a “cost causation” basis. Costs incurred on a “fixed” basis should not be allocated or recovered through a variable (i.e. energy) rate component. Otherwise, rates will result in cost avoidance and create cross subsidies. Therefore, SDG&E supports the recovery of generation capacity-related costs through the implementation of generation demand charges as opposed to energy only generation rates.<sup>2</sup>

In balancing the objectives of economic efficiency and equity with other objectives, such as energy efficiency and baseline allowances, SDG&E agrees that these trade-offs should be addressed in each utility’s separate rate design proceedings. In developing dynamic pricing and time differentiated rates (TDRs), the policy objectives of the Energy Action Plan (EAP), and rate design principles, such as those outlined in the Demand Response Research Center (DRRC) report (i.e. promote economic efficiency, promote equity, facilitate customer choice and clearly and simply communicate prices and costs) should also be balanced on a case-by-case analysis.

## **II. Sources of Marginal Costs**

SDG&E agrees that this phase of dynamic pricing should only focus on the generation component. SDG&E also agrees that while the wholesale market established by the Market Redesign and Technology Upgrade (MRTU) can be used as source for marginal costs, the Commission should refrain from using the MRTU until the MRTU is firmly implemented and well understood.<sup>3</sup>

In the interim, the Commission should develop proxies for marginal energy and capacity costs to be used in the design of dynamic rates. For energy, multiple methods

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<sup>2</sup> SDG&E proposed generation demand charges in its January 31, 2007 General rate Case Phase 2 filing. See the Direct Testimony of SDG&E Witness David A. Borden.

<sup>3</sup> The Commission should determine the extent to which energy costs provided under MRTU includes a capacity component.

can be used to determine generation marginal costs. Currently SDG&E uses the E3 proxy method for establishing marginal energy costs. Other options include 8760-hour analysis, the use of production cost models or, possibly, utility dispatch costs<sup>4</sup>.

Marginal capacity costs, however, should use new natural gas-fired combustion turbine (CT) capacity as a proxy to derive the market value of the generation capacity avoided by dynamic pricing rates. Dynamic pricing is intended to provide price signals in order to avoid the need for relatively high heat rate generating capacity that is only dispatched during peak demand periods. Therefore, in the long run, the market value of that type of generating capacity in California will be based on a new natural gas-fired CT. While most parties use the CT proxy (i.e. the “peaker” method) little consensus exists regarding the appropriate assumptions for incorporating energy profits netted against the cost to build the incremental CT.<sup>5</sup> In light of the different potential methodologies, the determination of the marginal energy and capacity costs should be conducted in each utility’s separate rate design proceeding.<sup>6</sup>

### **III. Rate Options**

With respect to dynamic pricing rate options, SDG&E agrees that while RTP should be explored as a viable rate option, to implement RTP at this time is premature. Until MRTU is implemented and well understood with respect to the types of price signals offered by the wholesale market, too much uncertainty surrounding the ability to successfully implement a RTP rate option exists.<sup>7</sup> In addition, at the Workshop many parties voiced concerns that current resource adequacy requirements will likely dampen the potential for demand response to RTP. Therefore, in implementing RTP rates, the dual interests of providing resource adequacy and price-responsive demand response must be reconciled by the Commission and California Independent System Operation (CAISO).

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<sup>4</sup> In particular, discussion at the Workshop illustrated the difficulty in identifying utility dispatch costs as a pre-MRTU proxy.

<sup>5</sup> In SDG&E’s most recent General Rate Case (GRC) Phase 2 proceeding, the marginal generation capacity values proposed by intervening parties ranged from \$31/kW-yr to \$139/kW-yr.

<sup>6</sup> Additionally, because this phase of the proceeding has been categorized as “quasi-legislative”, the calculation of marginal capacity cost proxies should likewise occur in a rate setting proceeding.

<sup>7</sup> For example, MRTU is not scheduled to roll out scarcity pricing until Release 1A. Experience with scarcity pricing, once introduced, is also critical to implementing RTP.

SDG&E agrees, however, that in the interim, to continue moving towards more dynamic pricing options, the Commission should continue to explore the implementation of rate options such as critical peak pricing (CPP). The use of marginal cost proxies for energy and capacity costs in the development of CPP rates should provide sufficient price differentials between CPP and non-CPP periods to encourage customer demand response. Nevertheless, in addressing the development of CPP rates and in establishing CPP periods and triggers, the Commission should recognize both the operational and customer characteristics differences particular to each utility.

Even though many parties presented multiple variations of time-of-use (TOU) tariffs, these variations should not be viewed as movement towards more dynamic pricing rates. While TOU variations should be considered as potential rate options, SDG&E recommends that the Commission adopt default dynamic pricing tariffs for each of the utility's customer classes. Because the value of the price signal provided depends on the customer's ability to understand the rate structure, receive the price signal and act, the level of sophistication and complexity of specific dynamic price signals should vary with the value of the information provided in the price signal to the customer.

Dynamic rates should be designed in such a fashion where a particular price signal can be provided to the customer with little or no transactions cost and that the information content embedded in such a price signal achieves corresponding behavioral actions that allow customers to manage their energy usage and resulting energy bills. Therefore, SDG&E agrees that for medium and large C&I customers, the Commission should explore a default CPP type rate, with TOU and eventually RTP tariffs as potential rate options. For the Agricultural customers, SDG&E again recommends that the Commission seek to implement a CPP type of default dynamic rate while TOU variations as presented by other parties in this proceeding can be explored as additional rate options. However, while SDG&E supports customer choice, SDG&E is also cautious in that too many rate options may lead to diminishing returns as customers will select the rate that provides the lowest bill with the least amount of change.

SDG&E recognizes that in implementing default dynamic rates, each customer must be provided with the available information and tools required to allow them to make informed decisions and achieve meaningful demand response. As SDG&E has

previously proposed in its recent GRC Phase 2 filing<sup>8</sup>, this should include customer education and support in the form of technical assistance and incentives, as well as bill protection.<sup>9</sup>

For small commercial and residential customers, SDG&E believes that a narrower portfolio of rates for these customers would simplify marketing and customer education efforts, and reduce administrative costs. Thus, the introduction of TOU rates for small commercial customers should be encouraged as a step towards introducing dynamic pricing rates. For the residential customer class, because of the rate limitations associated with Assembly Bill 1X (AB1X), the implementation of a peak time rebate (PTR) should be pursued as an interim step to adopting dynamic pricing rate options. While some options can initially be offered on a voluntary basis, the implementation of TOU and CPP rates should be explored as default options once the AB1X restrictions have been removed.

#### **IV. Hedging**

Most parties agree that under the current resource adequacy (RA) rules, customer rates currently reflect the costs associated with the physical hedge (i.e. the fifteen percent reserve margin requirements). Given the current RA requirements, determining what differences should be reflected in rates with respect to the hedging premium that should be included in “flatter” rate designs is difficult. While participation credits can potentially be used as a proxy for hedging, they are primarily marketing tools in that they are linked to encouraging participation in dynamic pricing options. SDG&E, however, recommends caution in the use of participation credits, since the costs of reserves are currently included in rates. Requiring customers to pay additional costs associated with participation credits may be “double counting” hedging premiums.

With respect to hedging and dynamic rates, customers should have the ability to hedge their exposure to price volatility. This can be accomplished through the introduction of rate components, such as the capacity reservation charge (CRC) currently included in SDG&E’s proposed GRC Phase 2 Settlement Agreement/ CPP rate

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<sup>8</sup> See the testimony of witness Joseph S. Velasquez in SDG&E’s 2007 GRC Phase 2 proceeding.

<sup>9</sup> SDG&E looks forward to further discussion on the topic of customer education as it pertains to dynamic pricing in the workshop scheduled for April 2008.

proposals.<sup>10</sup> CRCs are designed to allow customers to reserve capacity that, during CPP events, would not be subject to CPP rates. The cost associated with the reserved capacity is recovered over the entire year as compared to being recovered from only a select number of CPP events. Other options can also include the development of two-part RTP rates and the ability to acquire hedges in the market through third party providers in light of the on-going proceeding (R.07-05-025) addressing the reinstatement of direct access.<sup>11</sup>

## **V. Other Issues**

With respect to customer access to usage data, currently customers with interval meters (IDR) can view usage data the following day without additional technology. To view usage data in “real time”, customers with IDR meters can install technology to access the meter pulse data. With the implementation of advanced meter infrastructure (AMI) (i.e. smart meters), customers will have the ability to view usage in “real time” via the Home Area Network (HAN) communications. However, the customer will need to install a HAN compatible energy management system or a HAN compatible energy information presentation/display device.

## **VI. Conclusion**

As discussed herein, SDG&E respectfully requests that the Commission consider SDG&E’s Comments when formulating dynamic pricing policy.

Respectfully Submitted,

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December 11, 2007

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<sup>10</sup> Motion for Adoption of All Party and All Issue Settlement, Attachment D, filed November 1, 2007.

<sup>11</sup> In addressing the issue of hedging, the Commission should incorporate input from a procurement perspective in order to accurately assess the cost differences that should be reflected in the development of hedging premiums.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **San Diego Gas & Electric Company's (U 902 E) Comments on the November 2007 Workshop Described in the August 22, 2007 Supplemental Scoping Memo and Assigned Commissioner's Ruling Updating Issues List, Schedule, and Categorization** on each party named in the official service list for proceeding A.06-03-005 by electronic service, and by U.S. Mail to those parties who have not provided an electronic address.

Copies were also sent via Federal Express to Commissioner Rachelle B. Chong and assigned Administrative Law Judge David K. Fukutome.

Executed this 11<sup>th</sup> day of December 2007 at San Diego, California.

/s/ Susan A. Long  
Susan A. Long





CPUC Home

## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

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**PROCEEDING: A0603005 - PG&E - TO REVISE ITS  
FILER: PACIFIC GAS AND ELECTRIC COMPANY (U39E)  
LIST NAME: LIST  
LAST CHANGED: DECEMBER 7, 2007**

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